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June 25, 2024

BY ECF

The Honorable Michael A. Hammer, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Federal Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *Merck & Co., Inc., et al. v. Merck KGaA*, Civil Action No. 16-266 (ES/MAH)

Dear Judge Hammer:

On June 24, 2024, consistent with the Court's March 6, 2024 Text Order (ECF No. 247), the Parties filed their fully briefed *in limine* motions. (*See generally* ECF Nos. 261-292). Parts of the Parties' filings were made under seal. Specifically, the following docket entries were filed under temporary seal under L. Civ. R. 5.3(c)(2): ECF Nos. 263, 265, 266, 267, 270, 272, 273, 275, 277, 278, 279, 281, 288, 283, 286, 287, 289, 291, & 292. The current deadline to file the consolidated Motion to Seal as to these filings is July 8, 2024.

The Parties have met-and-conferred and believe that any Opinions on the *in limine* Motions are likely to implicate the same confidential material at issue in the temporary sealed filings mentioned above. Accordingly, the Parties respectfully request that the deadline to file the aforementioned consolidated Motion to Seal be extended until 14 days after all of the *in limine* Motions have been resolved. The Parties believe that this will be more efficient, because, at that time, the Parties will file one consolidated Motion to Seal that addresses the briefing as well as any portion of the Court's Opinions on the *in limine* Motions that the Parties may seek to keep under seal.

If this request is acceptable to the Court, we respectfully request Your Honor endorse this letter as "So Ordered." We appreciate Your Honor's attention to this matter.

Respectfully,

/s/ Cynthia S. Betz
Cynthia S. Betz

CC: All counsel of record (via ECF)

SO ORDERED this _____ of June 2024:

Hon. Michael A. Hammer, U.S.M.J.